

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**DECISION GRANTING INTERVERNOR COMPENSATION TO THE UTILITY
REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO
DECISIONS (D.) 12-11-016, D.13-05-034, D.13-11-024, D.14-11-042, D.14-012-023,
AND D.14-12-081.**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decisions (D.) 12-11-016, D.13-05-034, D.13-11-024, D.14-11-042, D.14-12-023, D.14-12-081
Claimed: \$ 40,513.76	Awarded: \$40,513.76
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Anne E. Simon

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p><u>Decision 12-11-016</u> This decision conditionally accepts, as modified, the 2012 Renewables Portfolio Standard (RPS) Procurement Plans, including the related Solicitation Protocols, filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).</p> <p><u>Decision 13-05-034</u> This decision orders Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) to revise their Feed-in Tariff (FiT) programs to include a new streamlined standard contract and revised tariffs.</p> <p><u>Decision 13-11-024</u> This decision conditionally accepts, as modified, the draft 2013 Renewables Portfolio Standard (RPS) Procurement Plans, including the related solicitation protocols, filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).</p>
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	<p><u>Decision 14-11-042</u> This decision conditionally accepts, as modified, the draft 2014 Renewables Portfolio Standard (RPS) Procurement Plans, including the related solicitation protocols, filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E). The decision also makes modifications to the Renewable Auction Mechanism (RAM) and orders an additional solicitation for 2015.</p> <p><u>Decision 14-12-023</u> This decision completes the rules for retail sellers' compliance with the renewables portfolio standard (RPS) program under the mandates of Senate Bill 2 (1X) (Simitian).</p> <p><u>Decision 14-12-081</u> This decision implements the provisions of Senate Bill (SB) 1122 (Rubio) that amends Pub. Util. Code § 399.20 (the "feed-in tariff" provisions) of California's renewables portfolio standard (RPS) program to require that investor-owned utilities (IOUs) procure mandated quantities of RPS-eligible generation from facilities using specified types of bioenergy.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	See Comment #1	Verified.
2. Other specified date for NOI:	June 9, 2011	Verified.
3. Date NOI filed:	June 7, 2011	Verified.
4. Was the NOI timely filed?		Yes.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	See Comment #2	P.10-08-016
6. Date of ALJ ruling:	See Comment #2	November 22, 2010
7. Based on another CPUC determination (specify):	See Comment #2	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	P.10-08-016	P.10-08-016
10. Date of ALJ ruling:	November 22, 2010	November 22, 2010
11. Based on another CPUC determination (specify):		

12. Has the Intervenor demonstrated significant financial hardship?		Yes.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	R.15-02-020	D. 14-12-081
14. Date of issuance of Final Order or Decision:	March 6, 2015	December 26, 2014
15. File date of compensation request:	May 5, 2015	Verified.
16. Was the request for compensation timely?		Yes, see below.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	The Order Instituting Rulemaking 11-05-005 states that any Notice of Intent to Seek Compensation "should be filed within 30 days of the date this OIR is mailed." (page 20). The OIR was mailed on May 10, 2011. TURN filed its NOI on June 7, 2011 even though the original eligibility granted in R.08-08-009 was deemed to remain in force.	The Commission accepts this assertion.
2	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission's Intervenor Compensation guide, "normally, an ALJ Ruling needs <u>not</u> be issued unless: (a) the <i>NOI</i> has requested a finding of "significant financial hardship" under § 1802(g). (b) the <i>NOI</i> is deficient; or (c) the ALJ desires to provide guidance on specific issues of the <i>NOI</i> ." (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN's NOI.	The Commission accepts this assertion.
3	The issuance of R.15-02-020 officially closed R.11-05-005 (page 2) and triggered the opportunity to seek compensation pursuant to Commission Rule 17.3 which allows	The Commission accepts this assertion.

	requests to be submitted within 60 days of any Commission decision closing the proceeding.	
		<p>For its showing of timeliness, TURN relies on Rule 17.3 of the Commission's Rules of Practice and Procedure, which states in relevant part: A request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution, but in no event later than 60 days after the issuance of the decision closing the proceeding. No decision has been issued in R.11-05-005 closing the proceeding. However, in R.15-02-020, an Order Instituting Rulemaking was issued on March 6, 2015 stating that R.15-02-020 would continue implementation of the California Renewable Portfolio Standards Program, succeeding R.11-05-005.</p> <p>No decision has yet issued in R.11-05-005 closing the proceeding. TURN's request is therefore timely.</p>

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. 2012 PROCUREMENT PLANS</p> <p>TURN urged the Commission to reject DRA's arguments that locational preferences for renewable projects within the CAISO balancing area authority violate law, are unreasonable and would inappropriately limit competition. TURN argued that this preference is allowed under state law and would benefit ratepayers.</p> <p>The Commission declined to modify IOU procurement plans to remove this preference, noting "we agree with TURN that the preferences are not contrary to the</p>	<p><u>TURN reply comments, July 18, 2012, pages 1-3.</u></p> <p><u>Decision 12-11-016, page 22.</u></p>	<p>Yes.</p>

<p>requirements of the RPS program. As TURN comments, the RPS program does not, for example, require the procurement of products from all three portfolio content categories.”</p>		
<p>2. 2012 PROCUREMENT PLANS</p> <p>TURN opposed the use of a non-zero integration adder in utility solicitations and argued that any adder must be developed in a public process subject to review and comment, and should be tied to the CAISO integration modeling under consideration in R.12-03-014, prior to being used in a utility solicitation.</p> <p>The Commission agreed with TURN’s position, denied the proposals of PG&E and SDG&E to use a non-zero adder, and required that any adder must be developed in a public process in either R.12-03-014 or R.11-05-005.</p>	<p><u>TURN reply comments, July 18, 2012, pages 3-4.</u></p> <p><u>D.12-11-016, pages 28-29</u></p>	<p>Yes.</p>
<p>3. 2012 PROCUREMENT PLANS</p> <p>TURN expressed concern that the elimination of the Tax Credit Mitigation Option (TCMO) could undermine the viability of contracts with renewable energy projects under development with post-2016 online dates. TURN urged the Commission to recognize that developers will utilize all available tax credits, will not finance uneconomic projects, and may need the TCMO.</p> <p>The Commission agreed with TURN’s concern that renewable developers with expected online dates after 2016 will assume the benefits of any federal tax incentives available at the time a</p>	<p><u>TURN reply comments, July 18, 2012, pages 4-6.</u></p> <p><u>D.12-11-016, pages 49-50.</u></p>	<p>Yes. The decision adopted TURN’s position in part.</p>

bid is prepared. The Commission declined to remove this term from a pro forma contract but agreed that parties may decide to include this term in a final contract to address post-2016 tax credit risks.		
4. ReMAT TURN supported a decrease in the MW allocation for each ReMAT auction in order not to distort the price adjustment mechanism. The Commission revised the PD to adopt this modification.	<u>TURN Reply Comments, April 15, 2013, pages 1-2.</u> <u>D.13-05-034, pages 10-11, footnote 26.</u>	Yes.
5. ReMAT TURN opposed the proposal to eliminate the collateral requirement due to the fact that it protects ratepayers against gaming. The Commission agreed with TURN and rejected the proposal.	<u>TURN Reply Comments, April 15, 2013, page 5.</u> <u>D.13-05-034, pages 42-43</u>	Yes.
6. 2013 PROCUREMENT PLANS TURN urged the Commission to reject proposed non-zero integration cost adders and to defer any determinations on such adders until the results of system modeling conducted in R.12-03-014 are complete. The Commission agreed with TURN, reiterated the importance of developing such adders as part of a broad assessment of system needs, and directed that final 2013 Procurement Plans shall remove any language referring to the use of non-zero integration cost adders.	<u>TURN opening comments, July 12, 2013, pages 5-6.</u> <u>D.13-11-024, pages 26-28</u>	Yes.
7. 2013 PROCUREMENT PLANS TURN urged the Commission to reject PG&E's proposal to give preference to contracts of 10-15 years through its proposed a	<u>TURN opening comments, July 12, 2013, pages 6-7.</u>	Yes.

<p>Portfolio Adjusted Value methodology that unreasonably disfavors contract terms of 20 and 25 years.</p> <p>The Commission agreed with TURN that PG&E's proposal "has not been reasonably justified" and directed PG&E to exclude the contract term length adjustment.</p>	<p><u>D.13-11-024, pages 44-45</u></p>	
<p>8. RENEWABLE AUCTION MECHANISM (RAM)</p> <p>TURN recommended that the utilities be required to hold a RAM 6 auction in time to take advantage of potentially expiring federal tax credits.</p> <p>The Commission adopted TURN's recommendation and ordered a RAM 6 auction.</p>	<p><u>TURN Comments, January 30, 2014, Section 2.2</u></p> <p><u>D.14-11-042, pages 90-91, 102-104.</u></p>	<p>Yes.</p>
<p>9. RENEWABLE AUCTION MECHANISM (RAM)</p> <p>TURN argued against the staff proposal to expand project eligibility WECC-wide.</p> <p>The Commission rejected this proposal and restricted eligibility to the CAISO control area.</p>	<p><u>TURN Comments, January 30, 2014, Section 3</u></p> <p><u>D.14-11-042, pages 96-98.</u></p>	<p>Yes.</p>
<p>10. COMPLIANCE AND ENFORCEMENT</p> <p>TURN urged the Commission to reject proposals that would allow a retail seller to receive a waiver of any RPS quantity requirement for reasons not specifically enumerated in §399.15(b)(5).</p> <p>The Commission agreed that the identified statutory conditions are the only basis for granting a waiver or reduction of Procurement Quantity or Balance Requirements. The Commission found that any circumstances that legitimately prevent compliance "will present themselves as one of</p>	<p><u>TURN reply comments, November 12, 2013, pages 1-4.</u></p> <p><u>D.14-12-023, page 36</u></p>	<p>Yes.</p>

the conditions listed in the statute, even if they arise from a unique circumstance.”		
<p>11. COMPLIANCE AND ENFORCEMENT</p> <p>TURN urged the Commission to retain existing RPS penalty levels, to reject SCE’s claim that penalties are only one enforcement option, to reject proposals to set penalties at the expected cost of renewable procurement, and to reject the use of an alternative compliance mechanism</p> <p>The Commission retained existing RPS penalty levels. The Commission cited TURN’s arguments in rejecting SCE’s claim that the Legislature did not intend to require that penalties be imposed for failure to meet RPS procurement requirements. The Commission agreed with TURN and rejected efforts to calibrate the penalty to approximate the costs of compliance. The Commission also rejected proposals for the development of an alternative compliance mechanism.</p>	<p><u>TURN reply comments, November 12, 2013, pages 6-9.</u></p> <p><u>D.14-12-023, pages 38-40, 49-51.</u></p>	Yes.
<p>12. COMPLIANCE AND ENFORCEMENT</p> <p>TURN urged the Commission to conclude that the statutory changes in AB 2187 apply only to Electric Service Providers and not to any other type of retail seller.</p> <p>The Commission agreed with TURN and concluded that AB 2187 applies only to contracts executed by ESPs prior to January 14, 2011.</p>	<p><u>TURN reply comments, November 12, 2013, pages 5-6.</u></p> <p><u>D.14-12-023, pages 7-8</u></p>	Yes.
<p>13. SB 1122</p> <p>TURN supported the alternative recommendation to modify the</p>		Yes.

<p>ReMAT tariff to allow a generator to pay for any interconnection upgrade costs in excess of \$300,000 as long as there are no impacts on ratepayers.</p> <p>The Commission adopted the alternative recommendation supported by TURN.</p>	<p><u>TURN Reply Comments, January 16, 2014, page 9</u></p> <p><u>D.14-12-081, pages 47-48.</u></p>	
<p>14. SB 1122</p> <p>TURN supported the Staff Proposal on the Initial Tariff Price, but noted that it should be updated for recent RAM data.</p> <p>The Commission adopted the Staff Proposal and, consistent with TURN's recommendation, ordered that the pricing be updated for RAM 4 results.</p>	<p><u>TURN Comments, December 20, 2013, Section 2.2.</u></p> <p><u>D.14-12-081, pages 47-48</u></p>	<p>Yes. <i>See also</i> D.14-12-081 at 54.</p>
<p>15. SB 1122</p> <p>TURN proposed a temporary reduction in bid quantity requirements until at least one project accepts on offer price.</p> <p>The Commission adopted TURN's recommendation.</p>	<p><u>TURN Comments, December 20, 2013, Section 2.3.</u></p> <p><u>D.14-12-081, page 58</u></p>	<p>Yes.</p>
<p>16. SB 1122</p> <p>TURN initially supported PG&E's recommendation of a price cap equal to 200% of the average RAM price, but later supported SCE's fixed price cap.</p> <p>The Commission declined to adopt a firm price cap but modified the PD to authorize the Director of Energy Division to initiate a review process if prices exceed a fixed maximum.</p>	<p><u>TURN Reply Comments, January 16, 2014, Section 3.1.</u></p> <p><u>TURN Reply Comments on PD, December 15, 2014, pages 1-3.</u></p> <p><u>D.14-12-081, pages 61-62</u></p>	<p>Yes. D.14-12-081 does not adopt either price cap approach advocated by TURN, but approves the concept that "there should be a price point at which review of the program price is appropriate." (<i>Id.</i> at 62.)</p>

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: Agricultural Energy Consumers Association (AECA), Bioenergy Association of California (BAC), California Wind Energy Association (CalWEA), Center for Biological Diversity (CBD), Clean Coalition; Dairy Cares, Coalition of California Utility Employees, Environmental Defense Fund, Green Power Institute (GPI), Independent Energy Producers (IEP), L. Jan Reid (Reid), Large-Scale Solar Association, Sierra Club of California, The Union of Concerned Scientists.		Verified
d. Intervenor's claim of non-duplication: TURN took great pains to avoid duplication with other like-minded intervenors by avoiding devoting time to issues that were comprehensively addressed by other intervenors. TURN coordinated with other intervenors as appropriate (i.e. when there would be savings in the overall time devoted to the case) but also took positions adverse to ORA and other intervenors on a number of issues. TURN largely argued for entirely unique positions on other contested issues in the proceeding. Due to the relatively small number of hours that TURN devoted to each issue in the proceeding, and the wide range of contributions attributable to TURN's participation, the Commission should not conclude that any reductions in compensation are warranted based on duplication of effort.		Verified

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>As demonstrated in the substantial contribution section, TURN prevailed on a wide range and number of issues in four separate decisions. Since the rulemaking did not address specific requests for cost recovery by Investor Owned Utilities, none of the decisions identified in this request include authorization to recover any particular revenue requirements. Therefore, it is not possible to calculate a precise amount of ratepayer savings that will be realized through TURN's involvement.</p> <p>Meeting the California RPS program targets requires billions of dollars of power purchase commitments by the IOUs. TURN's involvement was focused on the following objectives:</p> <ul style="list-style-type: none"> • ensuring that renewable energy commitments provide the highest value to ratepayers and the state of California. • ensuring that the utilities rely upon the least expensive methods of procurement for purposes of implementing the Feed-in Tariff and Renewable Auction Mechanism. • preventing unreasonable discrimination against intermittent resources and sellers offering longer-term contracts. • ensuring that federal tax benefits for renewable energy are fully monetized and passed through to utility customers. • adopting strong RPS compliance rules and penalty provisions to ensure that all retail sellers meet California's aggressive renewable energy targets. <p>Given the magnitude of costs at stake under the RPS, RAM, ReMAT and SB 1122 programs, the benefits produced by TURN's substantial contributions far exceed (by orders of magnitude) the small cost of TURN's participation in the proceeding. TURN's claim should therefore be found to be reasonable.</p>	<p>Intervenor's costs are reasonable in relation to the significance of the RPS Program.</p>
<p>b. Reasonableness of hours claimed:</p> <p>Given the breadth and depth of TURN's contributions to the final resolution of contested issues in this proceeding across six separate decisions, the amount of time devoted by its staff is fully reasonable. TURN did not retain any outside consultants to assist with this case and devoted the minimum number of hours to reviewing rulings, drafting</p>	<p>The hours claimed are reasonable in relation the work performed.</p>

<p>pleadings, reading comments submitted by other parties, and evaluating proposed decisions. TURN did not conduct discovery or perform significant amounts of independent research. TURN's pleadings were highly substantive given the amount of time devoted to the task.</p> <p>The small number of hours devoted to the wide range of issues in this case demonstrates the efficiency of TURN's attorneys. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. Given the level of success achieved by TURN in this proceeding across a range of issues, the amount of time devoted by staff is fully reasonable.</p> <p><u>Reasonableness of Staffing</u></p> <p>TURN devoted two attorneys to this proceeding and did not rely on outside consultants for the work related to this request. Each individual focused on unique issues and engaged in a minimum of duplication. TURN's two attorneys were Matthew Freedman and Marcel Hawiger. Mr. Freedman was the lead attorney on procurement plans and compliance/enforcement issues. Mr. Hawiger was the lead attorney on Feed-in Tariff issues and the Renewable Auction Mechanism (RAM) although Mr. Freedman provided support for these filings. TURN's decision not to rely on outside consultants for the work claimed in this request reduced the total number of personnel and hours required.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 12.5 hours devoted to the preparation of compensation-related filings. Given the fact that this request covers six separate decisions over the course of three calendar years, the time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p>GP – 7.5 hours – 8% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing the initial applications and Commission rulings, initial review of utility filings and motions, reviewing pleadings submitted by other parties and review of proposed decisions. TURN also includes several hours in this category devoted to attending workshops and meeting with CPUC staff on RPS contracting issues.</p>	Verified.

2012 PROCUREMENT PLAN – 9.75 hours – 10% of total

Work on the 2012 RPS Procurement Plans filed by PG&E, SCE and SDG&E approved in D.12-11-016. Includes reviewing the plans, comments submitted by other parties, and the proposed decision. Topics addressed include locational preferences for resources, integration adders and tax credit mitigation issues.

ReMAT – 14 hours –15% of total

Work on revisions to the Renewable Market Adjusting Tariff (ReMAT) approved in D.13-05-034. Includes reviewing comments submitted by other parties, drafting comments, and evaluating the proposed decision. Topics addressed include allocations for each auction and collateral requirements.

2013 PROCUREMENT PLAN – 15 hours –16% of total

Work on the 2013 RPS Procurement Plans filed by PG&E, SCE and SDG&E approved in D.13-11-024. Includes reviewing the plans, comments submitted by other parties, and the proposed decision. Topics addressed include preferences for shorter-term contracts and integration adders.

RENEWABLE AUCTION MECHANISM – 23.5 hours – 25% of total

Work on modifications to the Renewable Auction Mechanism (RAM) approved in D.14-11-042. Includes reviewing comments submitted by other parties, drafting comments, and evaluating the proposed decision. Topics addressed include the proposal for a 6th auction in 2015 and the potential expansion of resource eligibility criteria.

COMPLIANCE AND ENFORCEMENT – 9.25 hours –10% of total

Work on rules for retail seller compliance with RPS program requirements under SB 2 (1X) adopted in D.14-12-023. Includes reviewing comments submitted by other parties, drafting comments, and evaluating the proposed decision. Topics addressed include the conditions for a waiver of procurement requirements, penalty provisions, and the implementation of AB 2187.

SB 1122 – 14.75 hours – 16% of total

Work on the implementation of SB 1122 (Rubio) establishing procurement requirements relating to specified types of bioenergy approved in D.14-12-081. Includes reviewing comments submitted by other parties, drafting comments, and evaluating the proposed decision. Topics addressed include interconnection costs, initial tariff prices, and mechanisms for reducing bid quantity requirements.

COMP – 12.5 hours

Work preparing TURN's notice of intent to claim compensation and the final request for compensation.

TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour s	Rate \$	Total \$
Marcel Hawiger	2012	0.75	375	D.14-12-073; D.15-01-049	281.25	0.75	\$375.00	\$281.25
Marcel Hawiger	2013	24.75	400	D.14-11-019; D.15-01-016	9,900.00	24.75	\$400.00	\$9,900.00
Marcel Hawiger	2014	24.5	410	Resolution ALJ-303 (2.56% COLA)	10,045.00	24.5	\$410.00	\$10,045.00
Matthew Freedman	2012	10.25	375	See Comment #1	3,843.75	10.25	\$375.00	\$3,843.75
Matthew Freedman	2013	28	400	D.14-11-019	11,200.00	28	\$400.00	\$11,200.00
Matthew Freedman	2014	6	410	Resolution ALJ-303 (2.56% COLA)	2,460.00	6	\$410.00	\$2,460.00
Subtotal: \$37,730.00						Subtotal: \$37,730.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Matthew Freedman	2015	9.5	\$205	Resolution ALJ-303 (@ 50% of \$410)	1,947.50	9.5	\$205.00	\$1,947.50
Marcel Hawiger	2015	3	\$205	Resolution ALJ-303 (@ 50% of \$410)	615.00	3.0	\$205.00	\$615.00
Subtotal: \$2,562.50						Subtotal: \$2,562.50		

COSTS				
#	Item	Detail	Amount	Amount
1	Copies	Copying of pleadings for ALJ and Commissioner offices	72.86	\$72.86
2	LEXIS fees	Costs of legal research	80.44	80.44
3	Phone	Costs of phone calls relating to this proceeding	0.18	0.18
4	Postage	Postage for pleadings to CPUC	67.78	67.78
Subtotal: \$221.26				Subtotal: \$221.26
TOTAL REQUEST: \$40,513.76				TOTAL AWARD: \$40,513.76
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate.</p>				
ATTORNEY INFORMATION				
Attorney		Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Freedman		March 2001	214812	No.
Marcel Hawiger		January 1998	194244	No.

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details
Comment 1	<p>2012 Hourly Rate for Matthew Freedman</p> <p>For Mr. Freedman's work in 2012, TURN seeks an hourly rate of \$375, an increase of 7.2% from the previously awarded rate of \$350 for 2011. This increase is consistent with the general 2.2% cost-of-living increase provided for in Res. ALJ-281, plus the first of two 5% step increases available with his move to the 13+ years' experience tier.</p>

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>TURN previously received a rate of between \$350 and \$370 for Mr. Freedman's 2012 hours. The Commission awarded \$350 in D.12-07-019, \$360 in D.13-02-032 and D.13-05-008, and \$370 in D.13-10-037 and D.13-12-028. The award of \$370 in D.13-10-037 was based on a faulty application of the 7.2% increase to the 2011 rate of \$350. Increasing the \$350 rate for 2011 by 7.2% leads to a 2012 rate of \$375.2 which is rounded to \$375. TURN requests that the Commission accept this corrected calculation for purposes of pending requests.</p> <p>TURN currently has three pending requests for compensation that include 2012 hours for Mr. Freedman at the \$375 rate (in A.11-10-002, filed March 24, 2014, R.12-03-014, filed May 13, 2014 and in I.12-10-013, filed January 23, 2015). TURN is not seeking to change the hourly rate for Mr. Freedman's work in 2012 for any of the pending or awarded requests that include his 2012 work. TURN is seeking a \$375 rate for 2012 work in all future compensation requests that include 2012 hours for Mr. Freedman, consistent with the Commission's prior decisions and resolutions providing for step increases.</p>
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PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. TURN has made a substantial contribution to Decision (D.) 12-11-016, D.13-05-034, D.13-11-024, D.14-11-042, D.14-12-023 and D.14-12-081.
2. The requested hourly rates for TURN's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$40,513.76.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$40,513.76.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2013 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning July 19, 2015, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, 2015, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D1211016, D1305034, D1311024, D14-11-042, D14-12-023, D1412081		
Proceeding(s):	R1105005		
Author:	ALJ Simon		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	May 05, 2015	\$40,513.76	\$40,513.76	N/A	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	The Utility Reform Network	\$375.00	2012	\$375.00
Matthew	Freedman	Attorney	The Utility Reform Network	\$400.00	2013	\$400.00
Matthew	Freedman	Attorney	The Utility Reform Network	\$410.00	2014	\$410.00
Marcel	Hawiger	Attorney	The Utility Reform Network	\$375.00	2012	\$375.00
Marcel	Hawiger	Attorney	The Utility Reform Network	\$400.00	2013	\$400.00
Marcel	Hawiger	Attorney	The Utility Reform Network	\$410.00	2014	\$410.00

(END OF APPENDIX)